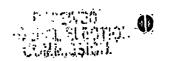




FEDERAL ELECTION COMMISSION Washington, DC 20463



We recommend that the Commission

TO: The Commission Kathleen Guith FROM: Acting Associate General Counsel for Enforcement Stephen Gura A Deputy Associate General Counsel for Enforcement BY: Peter Blumberg Assistant General Counsel C Saurav Ghosh Attorney

SUBJECT: MUR 7052 (Freedom Fund, et al.)

Pre-Probable Cause Conciliation

On April 26, 2016, the Commission found reason to believe that Freedom Fund and Lance Kolbet in his official capacity as treasurer ("Committee"), violated 52 U.S.C. §§ 30102(c), 30104(b), 30116(f), and that Thomas O'Gara (collectively, "Respondents") violated 52 U.S.C. § 30116(a)(1)(C), stemming from unreported, excessive in-kind contributions that O'Gara made, and the Committee knowingly accepted, in 2011 and 2012. The Commission authorized preprobable cause conciliation

accept this agreement and close the file in this matter.

 We believe this agreement sufficiently vindicates the Commission's enforcement interests under the circumstances presented. We therefore recommend that the Commission accept the attached signed agreement and close the file in this matter.

ا ماندور منطقه و د MUR 7052 (Freedom Fund, et al.) Memorandum to the Commission Page 2 of 2

RECOMMENDATIONS

1
2
-

- 1. Accept the attached signed conciliation agreement with Freedom Fund, Lance Kolbet in his official capacity as treasurer, and Thomas O'Gara.
- 2. Approve the appropriate letter.
- 3. Close the file.